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October 3, 2024

Via ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Freeman et al v. Giuliani*, 24-cv-06563-AKH, 24-mc-00353-LJL

Dear Judge Liman:

I represent Mr. Giuliani ("Defendant") in these cases. I write in response to the Court's Order, ECF 42, ordering Defendant to delist his New York apartment, to no longer offer it for sale, and to file proof on the docket that those steps have been taken.

Promptly after the Order appeared on the docket, I spoke on the telephone with Ms. Maria Bazo of Sotheby's Realty, who has been in charge of the marketing process for Defendant's apartment. I informed Ms. Bazo of the contents and requirements of the Court's Order, and asked her to take the steps necessary to delist the apartment and to stop offering it for sale. I then emailed her a copy of the Order, with a written request that she take the actions discussed on the telephone. She wrote back to me stating that the apartment has been delisted, unpublished on the web and marked off the market.

I attach to this letter a copy of my correspondence with Ms. Bazo.

Respectfully submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: Counsel of Record

Kenneth Caruso

From: Bazo, Maria <maria.bazo@sothebys.realty>
Sent: Thursday, October 3, 2024 12:52 PM
To: Kenneth Caruso
Cc: Boardman, Serena; Boardman Office; Ghesquiere, Marissa
Subject: RE: Giuliani Apartment / Take Off The Market

Hi Ken,

As per our conversation, confirming the subject listing has been marked Delisted in StreetEasy, Unpublished the Web and marked Permanently Off Market in Perchwell.

Please let us know if you need anything else.

Best regards,

Maria

Maria Bazo

Global Real Estate Advisor, Associate Broker, East Side Manhattan Brokerage
Sotheby's International Realty

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[Instagram](#) | [NYS Housing Discrimination Disclosure Notice and Form](#)

From: Kenneth Caruso <ken.caruso@kennethcarusolaw.com>
Sent: Thursday, October 3, 2024 12:29 PM
To: Bazo, Maria <maria.bazo@sothebys.realty>
Subject: Giuliani Apartment / Take Off The Market

Dear Ms. Bazo: As I informed you on the telephone, and as you will see in the attached court Order, U.S. District Judge Lewis J. Liman has ordered Mr. Giuliani to delist his apartment and to no longer offer it for sale. Would you please take the necessary steps—today—to do so; that is, delist it and stop offering it for sale. Would you please respond to this email to confirm that you have done so? Many thanks.

Kenneth A. Caruso

Kenneth Caruso Law

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